

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

ADVISORY AND STIPULATIONS RE: PLAINTIFFS' JOINT MOTION TO UNSEAL

The United States and counsel for the Legislators respectfully notify the Court that the parties have reached an agreement to facilitate resolution of Plaintiffs' Joint Motion to Unseal Documents and Testimony (ECF No. 503).

The United States and the Legislators hereby stipulate that the Court's order applying the five-factor balancing test adopted in its April 3 Order (ECF No. 226) and unsealing the document Bates stamped as TX_00087007-14 (PL 205) applies with equal force to all legislative documents designated as highly confidential on Plaintiffs' August 22, 2014 Exhibit List (ECF No. 503-1), with the exception of the document Bates stamped as TX_00005515-16 (PL 817).¹

In addition, the United States and the Legislators hereby stipulate that the Court's orders applying the five-factor balancing test adopted in its April 3 Order and unsealing excerpts of the July 29, 2014 deposition of Senator Tommy Williams and the July 11, 2014 deposition of Senator Dan Patrick apply with equal force to the entirety of all depositions previously placed under seal pursuant to an assertion of a state legislative privilege. Finally, the United States and

¹ The Court has already determined that this document will be maintained under seal unless and until it is addressed at trial.

the Legislators stipulate that the Court's orders with regard to the documents and deposition testimony previously discussed (excluding TX_00005515-16) apply with equal force to information contained in the expert reports of Dr. Chandler Davidson and Dr. Allan Lichtman.

The legislators maintain their objection to the unsealing of any and all documents and testimony over which they have claimed a state legislative privilege. However, the parties respectfully request that the Court resolve the pending Joint Motion to Unseal based on the above stipulations.

Date: August 28, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

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